

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JULIAN SANCTON, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPCO LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendant.

**ECF CASE**

No. 1:23-cv-10211

**DECLARATION IN SUPPORT OF  
MOTION FOR ADMISSION OF  
ATTORNEY PRO HAC VICE**

Rohit D. Nath, declares:

1. I am a Partner with the law firm of Susman Godfrey L.L.P.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the California Supreme Court and the Arizona State Bar.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7. My attorney registration number for the State Bar of California is 316062 and my registration number for the Arizona State Bar is 032701.
8. Wherefore, your declarant respectively submits that he be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-10211 for Plaintiff (Julian Sancton).

I, Rohit D. Nath, declare under penalty of perjury that the foregoing is true and correct.

Dated: November 22, 2023

Respectfully submitted,

/s/ Rohit D. Nath

Rohit D. Nath

CA State Bar No. 316062

SUSMAN GODFREY L.L.P.

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***Attorney for Plaintiff and the Proposed Class***